

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ALABAMA, NORTHERN DIVISION

IN RE:)
)
ROLTA UK LIMITED,) CASE NO. 20-82287-11
EIN: xxx/LZ30343) CHAPTER 11
)
Debtor.)

MOTION FOR JOINT ADMINISTRATION
OF CASES INVOLVING SIX RELATED DEBTORS

COME NOW, Rolta UK Limited, Rolta Global B.V., Rolta International, Inc., Rolta Middle East FZ, LLC, Rolta Americas, LLC, and Rolta, LLC, pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure, and move this Court to joint administer the above styled cases, and state as grounds as follows:

1. On October 29, 2020, the Debtors contemporaneously filed bankruptcy petitions pursuant to Chapter 11 of Title 11 of the United States Code, 11 U.S.C. § 101 *et seq.* (the "Bankruptcy Code"). ("Bankruptcy Code") ("Petition Date").
2. This Court has jurisdiction pursuant to 28 U.S.C. 1334, and venue is appropriate pursuant to 28 U.S.C. 157.
3. The Debtors are operating as debtors in possession pursuant to 1107 and 1108 of the Bankruptcy Code. No Trustee or committee has been appointed in this case.
4. This case involves six wholly owned entities by other corporate entities.
5. The cases and their operations are integrally inter-related, and many of the same creditors are involved in all six cases.
6. In order to avoid unnecessary cost and delay, the Debtors request that these cases be jointly administered under Case No. 20-82282-CRJ11 pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure.

7. Consideration has been given to protect the creditors of the different estates against potential conflict of interest, and any inter-debtor conflicts will be handled by conflict counsel which has been disclosed in the Application for Employment of Debtors' counsel.

8. Cause otherwise exists to permit the joint administration (not the substantive consolidation) of these estates.

WHEREFORE, the Debtors respectfully request that this case be jointly administered, and to grant such other and further relief as this Court deems just and proper.

/s/ Stuart M. Maples

STUART M. MAPLES
(ASB-1974-S69S)

MAPLES LAW FIRM, PC
200 Clinton Avenue West, Suite 1000
Huntsville, Alabama 35801
Tel: (256) 489-9779
Fax: (256) 489-9720
smaples@mapleslawfirmpc.com

CERTIFICATE OF SERVICE

I do hereby certify that on November 3, 2020, a copy of the foregoing document was served on the following by Electronic Case Filing a copy of the same.

Richard Blythe
P. O. Box 3045
Decatur, AL 35602
Bankruptcy Administrator

20 Largest Unsecured Creditors

All parties requesting notice

/s/ Stuart M. Maples

STUART M. MAPLES